

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

Master File No. 12-md-02311
Honorable Marianne O. Battani

This Document Relates to:

In Re: Automotive Wire Harness Case	2:17-cv-12054
In Re: Instrument Panel Clusters Case	2:17-cv-12030
In Re: Bearings Case	2:17-cv-12006
In Re: Fuel Senders Case	2:17-cv-12018
In Re: Heater Control Panel Case	2:17-cv-12024
In Re: Alternators Case	2:17-cv-11995
In Re: Anti-Vibrational Rubber Parts Case	2:17-cv-11997
In Re: Windshield Wiper Systems Case	2:17-cv-12049
In Re: Radiators Case	2:17-cv-12037
In Re: Starters Case	2:17-cv-12041
In Re: Ignition Coils Case	2:17-cv-12029
In Re: Motor Generators Case	2:17-cv-12034
In Re: Ballasts Case	2:17-cv-12028
In Re: Inverters Case	2:17-cv-12032
In Re: Electronic Powered Steering Assemblies Case	2:17-cv-12011
In Re: Fan Motors Case	2:17-cv-12012
In Re: Fuel Injection Systems Case	2:17-cv-12013
In Re: Power Window Motors Case	2:17-cv-12035
In Re: Automatic Transmission Fluid Warmers Case	2:17-cv-11999
In Re: Valve Timing Control Devices Case	2:17-cv-12044
In Re: Air Conditioning Systems Case	2:17-cv-11992
In Re: Windshield Washer Systems Case	2:17-cv-12048
In Re: Spark Plugs, Standard Oxygen Sensors, Air Fuel Ratio Sensors Case	2:17-cv-12039
In Re: Automotive Hoses Case	2:17-cv-12001
In Re: Ceramic Substrates Case	2:17-cv-12007
In Re: Power Window Switches Case	2:17-cv-11979

JOINT NOTICE REGARDING STAY OF ACTIONS

Plaintiffs are certain Auto Dealers who: are participating in certain Auto Dealer Class Action Settlements approved by the Court in the matter *In re: Automotive Parts Antitrust Litigation*, Master File No. 12-md-02311 (the “First Wave Settlements”), have opted out of certain subsequent Auto Dealer Class Action Settlements, and have filed the above-captioned actions against certain Defendants (the “Actions”). On September 13, 2017, the Court held a Status Conference at which the Court requested that Plaintiffs consider a proposal by counsel for certain Defendants to temporarily stay the Actions until after Plaintiffs have received their distributions in connection with the First Wave Settlements. The Plaintiffs submitted a report on September 20, 2017, confirming their agreement to the proposed stay. On November 27, 2017, the Court entered the Order to Stay Actions in each of the Actions. On September 12, 2018, Plaintiffs notified the Court of their intent to pursue the Actions.

Under the Court’s Order to Stay Actions, “Plaintiffs and Stipulating Defendants shall then meet and confer and report back to the Court within 30 days following that notice on the status of the Actions and proposed next steps for deadlines to effect service and submission of proposed scheduling orders for any Actions Plaintiffs intend to continue to pursue.” Order ¶2. Following the Parties’ discussions, they have agreed that by October 22 each of the Defendants will inform Plaintiffs whether or not they agree to waive formal service. For those Defendants who do not agree to waive formal service, Plaintiffs will thereafter complete service as follows:

- For any domestic Defendant who does not agree to waive formal service, Plaintiffs will complete service by December 21, 2018.

- For any non-domestic Defendant who does not agree to waive formal service, Plaintiffs will either (a) immediately begin the process of formal service under the Hague Convention or (b) file a motion for alternative service under Federal Rule of Civil Procedure 4(f)(3) no later than November 5, 2018 (which some Defendants have indicated they would oppose). In the event Plaintiffs do file such a motion, they would then complete service in accordance with the Court's ruling.

The Parties agree that Plaintiffs will inform Defendants when they have completed service on all of the Defendants in all of the above-captioned actions and that Defendants shall have 60 days from that date to respond to Plaintiffs' various Complaints. Plaintiffs and Defendants suggest that the Parties shall thereafter be required to meet and confer to submit a proposed scheduling order for each Action. However, the Parties anticipate that there may be some discussion of a proposed scheduling order (and/or related submission) for one or more of the Actions in the meantime.

DATED: October 12, 2018

Respectfully submitted,

/s/ Andrew G. Pate

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2018, a true and correct copy of the above and foregoing document was filed through the Court's CM/ECF filing system.

/s/Andrew Pate
Andrew Pate

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiffs met and conferred telephonically with counsel for Defendants, and this Joint Notice represents a consensus among the Parties.

/s/Andrew Pate
Andrew Pate